

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PA

JACOB and JAMES JUNG as Administrators
for the Estate of LOUIS JUNG, JR.

v.

YES CARE CORP., LALITHA TRIVIKRAM,
and MAUREEN, et al.

CASE NO. 24-CV-05618

**RESPONSE OF DEFENDANTS, YESCARE CORP., LALITHA TRIVIKRAM, AND
MAUREEN GAY, TO CROSSCLAIM OF CO-DEFENDANTS,
CITY OF PHILADELPHIA AND BLANCHE CARNEY**

COME NOW, the Responding Defendants, YesCare Corp., Lalitha Trivikram, and Maureen Gay, by and through their counsel, O'Connor Kimball LLP, and as and for their Response to the Crossclaims of Co-Defendants, City of Philadelphia and Blanche Carney, state as follows;

1. Responding Defendants incorporate by reference their Answer to the Plaintiff's Complaint and Affirmative Defenses, with reference to all documents referenced therein, as fully as if set forth herein at length.

2-6. The corresponding paragraphs of Co-Defendants' Crossclaim contain conclusions of law which are deemed denied and for which no response is required nor provided. Strict proof thereof is demanded at the time of trial.

WHEREFORE, Responding Defendants, YesCare Corp., Lalitha Trivikram, and Maureen Gay, respectfully request that judgement be entered in their favor and against Co-Defendants, City of Philadelphia and Blanche Carney.

O'CONNOR KIMBALL LLP

By: 

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Dated: 1/27/25

Attorney for Defendants, YesCare Corp., Lalitha Trivikram, M.D., and Maureen Gay, N.P.

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CERTIFICATE OF SERVICE

I, Thomas J. Gregory, Esquire, hereby certify that I caused a true and correct copy of the foregoing Response to Co-Defendants Crossclaim to be electronically filed on this this 27th day of ~~November, 2024~~, and thereby served via the Court's Electronic ECF Filing System upon:

January, 2027

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